

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
EUGENE DIVISION**

Elizabeth HUNTER; et al., on behalf of themselves and all others similarly situated,	)	
	)	
	)	Civil Action No. 6:21-cv-00474-
Plaintiffs,	)	AA
v.	)	
	)	<b>DECLARATION OF</b>
U.S. DEPARTMENT OF EDUCATION and	)	<b>CAMERON MARTINEZ</b>
Suzanne GOLDBERG, in her official capacity as	)	
Acting Assistant Secretary for Civil Rights,	)	
U.S. Department of Education,	)	
	)	
Defendants.	)	

I, Cameron Martinez, declare:

1. I am over 18 years of age and have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.
2. I am a resident of Riverside, California, located in Riverside County.
3. I began attending La Sierra University in September 2017. I expect to graduate in June 2022.
4. I chose La Sierra University because I wanted to go to a Seventh Day Adventist school. I had only attended public school prior to starting university. I also wanted to move out of state. I felt at home when I visited the campus and when I started attending La Sierra in 2017.
5. La Sierra has a Sexual Morality policy listed in its student handbook which addresses both LGBTQ students and cohabitating students. It states, in part, “we resolve to live consistently within traditional Christian values and teaching on sexuality.” The statement goes on to say “La Sierra’s policies are informed by an Adventist understanding of biblical principles. The university acknowledges the complexity of issues surrounding sexuality and is committed to the open and rigorous study of Scripture and discussion of all perspectives, both inside and outside the classroom.”
6. La Sierra’s student handbook states that it supports “the Seventh-day Adventist position on Homosexuality.”
7. The Seventh-Day Adventist position on Homosexuality states: “The Bible makes no accommodation for homosexual activity or relationships. Sexual acts outside the circle of a heterosexual marriage are forbidden[.]”

8. The Seventh-day Adventist position statement refers to Bible verses that state: “If a man has sexual relations with a man as one does with a woman, both of them have done what is detestable. They are to be put to death; their blood will be on their own heads.” Leviticus 20:13.
9. La Sierra also provides a “Q&A” for its Sexual Morality policy. The Q&A states:

***Q&A***

***What is La Sierra’s stance on the official recognition of LGBTQ clubs or organizations?***

- *At this time, La Sierra does not officially recognize student organizations representing alternative lifestyles.*

***Can students face disciplinary action just for identifying as LGBTQ (Lesbian, Gay, Bisexual, Transgender, Queer)?***

- *No. However, all students (LGBTQ and heterosexual) could face disciplinary action for misconduct.*

***May a student disagree with the universities [sic] statement on sexual relationships?***

- *Yes, you can disagree but within the context of respect and recognition of the values of the university.*
- *La Sierra University’s policies are informed by and adhere to biblical principles. The university acknowledges the complexity of issues surrounding sexuality, and is committed to the open and rigorous study of Scripture and discussion of all perspectives, both inside and outside the classroom. Regardless of one’s view on the subject, La Sierra University affirms the dignity and worth of every person and seeks to create a campus culture where each person is treated with Christian love, dignity and respect.*

***Is there support for LGBTQ students?***

- *Yes, there is support and we believe students who experience same sex attraction are best supported when they are able to share their questions, struggles, or their self-understanding with others in a trusted environment. Experiencing identity issues in isolation can be overwhelming; community support can be positive and nurturing. Thus the university offers support for LGBTQ and questioning students.*

***Can students be disciplined for sexual activity outside marriage?***

- *Sexual misconduct, depending on the facts and circumstances of each case, may result in disciplinary action. In all disciplinary matters, we seek to be redemptive in the lives of the individuals involved. Consequently, the university will offer pastoral care and assistance to support and strengthen the student’s resolve to live consistently within traditional Christian teaching on sexuality.*

10. I am a queer, non-binary person.
11. As a student, my problems have been with the administration and their actions, rather than with other students.

12. Whether it be having vague and problematic policies or their performative activism, queer students aren't protected at La Sierra.
13. When LGBTQ+ students have filed complaints of discrimination, myself among them, staff and faculty use their discretion to justify the lack of change on campus.
14. The administration does not fully support our LGBTQ+ group on campus and the work we are doing, as we are not allowed to be an officially recognized club.
15. While La Sierra no longer punishes a student merely for identifying as LGBTQ+, the school continues to adhere to a policy that considers homosexual activities and relationships to be "detestable," as is stated in the Seventh-day Adventist position on Homosexuality that is formally adopted by La Sierra in its Sexual Morality policy.
16. It feels threatening to know that La Sierra considers same-sex dating to be "sexual misconduct" that could result in my expulsion.
17. Even where a queer student is in a romantic, but non-sexual relationship, they could be subject to exploitation and potential discipline.
18. During my time as a criminal justice student, I witnessed ample amounts of homophobia and transphobia on campus.
19. I was once sat down by the director of the Corona, California campus to show me the righteousness of heterosexuality.
20. I have personally witnessed professors using hate speech about queer identities during lectures, with students present.
21. Most of the discrimination I have endured involves hate speech, performative activism, and censoring the on-campus LGBTQ+ group.
22. It has been very difficult to be a queer, disabled person of color at La Sierra. My leadership and opposition to La Sierra's "separate but equal" policies have been shut down on more than one occasion.
23. Universities such as La Sierra need to take the consequences of their actions against queer students seriously.
24. I am a federal income taxpayer in the United States. I will also have to repay student loans from the U.S. Department of Education that I took out to enroll in La Sierra.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 29 day of March, 2021.

By: S/Cameron Martinez

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Cameron Martinez